

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re)	PROMESA
sts)	Title III
THE FINANCIAL OVERSIGHT AND)	
MANAGEMENT BOARD FOR PUERTO RICO,)	No. 17 BK 3283-LTS
)	(Jointly Administered)
As a representative of)	
)	
THE COMMONWEALTH OF PUERTO RICO)	
<i>et al.,</i>)	
)	
	Debtors.¹)
)	
In re)	PROMESA
)	Title III
)	
THE FINANCIAL OVERSIGHT AND)	No. 17 BK 4780-LTS
MANAGEMENT BOARD FOR PUERTO RICO,)	
)	Re: Dkt. No. 1250
As a representative of)	
)	
PUERTO RICO ELECTRIC POWER)	
AUTHORITY,)	This Motion relates only to PREPA, and
)	shall be filed in the lead Case No. 17-BK-
)	3283-LTS, and PREPA's Title III case
)	(Case No. 17-BK-4780-LTS)
)	

**FEE EXAMINER'S INFORMATIVE MOTION AND STATEMENT OF
NO OBJECTION TO THE JOINT AAFAF/OVERSIGHT BOARD
SCHEDULING MOTION DEFERRING CONSIDERATION OF THE
PREPA RSA TO THE JULY 24, 2019 OMNIBUS HEARING**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the: (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and, (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

The Fee Examiner, by his counsel, Godfrey & Kahn, S.C., notifies the Court that he has no objection to the scheduling relief sought in the corrected *Urgent Motion to Extend and Establish Certain Deadlines Applicable to (1) the Joint Motion of PREPA and AAFAF Pursuant to Bankruptcy Code Sections 362, 502, 922, and 928, and Bankruptcy Rules 3012(a)(1) and 9019 for Order Approving Settlements Embodied in the Restructuring Support Agreement [ECF No. 1235]; and (2) Oversight Board and AAFAF's Motion Pursuant to Fed. R. Civ. P. 12(b)(6) to Dismiss Insurers' Motion for Relief From the Automatic Stay to Seek Appointment of a Receiver [ECF No. 1233]* [Dkt. No. 1250, Case No. 17-BK-4780-LTS] (the “**Scheduling Motion**”), deferring consideration of the (amended) *Joint Motion of Puerto Rico Electric Power Authority and AAFAF Pursuant to Bankruptcy Code Sections 362, 502, 922 and 928 and Bankruptcy Rules 2013(A)(1) and 9019 for Order Approving Settlements Embodied in the Restructuring Support Agreement and Tolling Certain Limitations Periods* [Dkt. No. 1235, Case No. 17-BK-4780-LTS] (“**Rule 9019 Motion**”). In support of the informative motion, counsel states that:

1. On May 21, 2019, PREPA and AAFAF filed the Scheduling Motion to adjourn consideration of the Rule 9019 Motion and related matters from the June 12 to the July 24, 2019 omnibus hearing.

2. The Scheduling Motion described several Potential Objectors² to the Scheduling Motion, but stated that the movants “do not know whether the Fee Examiner will consent to the scheduling motion.” Scheduling Motion at p. 4, n.5. This informative motion informs the Court and parties that the Fee Examiner *does consent* to the Scheduling Motion, reserving the right to

² Capitalized terms not otherwise defined have the same meanings ascribed to them in the Scheduling Motion.

object to the Rule 9019 Motion, if necessary, at an appropriate time and before any restated objection deadline.

3. For discussion purposes, the Fee Examiner already has circulated to the relevant parties and counsel a draft pleading that reflects his concerns and potential limited objection to the unrestricted and unchecked payment of professional fees and expenses of supporting creditors. *See* Definitive Restructuring Agreement, § 22.

Dated this 22nd day of May, 2019.

WE HEREBY CERTIFY that on this date, we electronically filed the foregoing objection with the Clerk of the Court using the CM/ECF system that will send notification of such filing to all attorneys of record registered in the use of the CM/ECF system.

EDGE Legal Strategies, PSC

s/Eyck O. Lugo

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